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4 **UNITED STATES DISTRICT COURT**
5 **CENTRAL DISTRICT OF CALIFORNIA**
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7 EVAN HIGHTOWER and ANN ROSS,
8 individually and on behalf of all other
9 individuals similarly situated,

10 Plaintiff,

11 vs.

12 JPMORGAN CHASE BANK, N.A., and
13 DOES 1-10 inclusive,

14 Defendants.
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Case No. 11-CV-01802 PSG (PLAx)

CLASS ACTION

11-CV-04294-PSG (PLAX)

11-CV-06061-PSG (PLAX)

11-CV-03428-PSG (PLAX)

11-CV-08147-PSG (PLAX)

11-CV-09727-PSG (PLAX)

12-CV-00833-PSG (PLAX)

11-CV-04450-PSG (PLAX)

11-CV-05646-PSG (PLAX)

11-CV-08217-PSG (PLAX)

12-CV-04752-PSG (PLAX)

12-CV-00367-PSG (PLAX)

12-CV-03308-PSG (PLAX)

Assigned for all Purposes to the
Honorable Philip S. Gutierrez

**SUPPLEMENTAL DECLARATION
OF ABEL MORALES WITH
RESPECT TO NOTIFICATION AND
CLAIMS ADMINISTRATION**

Date: August 3, 2015

Time: 1:30 p.m.

Courtroom: 880

1 I, ABEL E. MORALES, DECLARE AS FOLLOWS:

2 1. I am employed by CPT Group, Inc. ("CPT"), the Court-appointed class
3 action claims administrator for *Hightower, et al. v. JPMorgan Chase Bank, N.A., et al.*,
4 as the Case Manager. I have personal knowledge of the facts set forth in this
5 Declaration, and if called as a witness, could and would testify competently thereto.

6 2. I submit this Supplemental Declaration to update my prior Declaration
7 dated July 1, 2015.

8 3. As of the date of this declaration, one thousand seven hundred forty two
9 (1,742) Notice Packets were returned to our office by the Post Office, of which one
10 hundred fourteen (114) had a forwarding address. CPT performed a Skip Trace on the
11 returned Notices in an effort to locate a new address using Accurant, one of the most
12 comprehensive address databases available. It utilizes hundreds of different databases
13 supplied by credit reporting agencies, public records and a variety of other national
14 databases.

15 4. As a result of either a skip trace, forwarding address, or re-mail requests
16 from Class Members or Counsel, a total of three thousand three hundred ninety eight
17 (3,398) Notice Packets have been re-mailed to-date.

18 5. As of the date of this declaration, CPT has received a total of thirty two
19 thousand six hundred ninety five (32,695) responses.

20 6. As of the date of this declaration, CPT has not received any written
21 objections to the settlement

22 7. As of the date of this declaration, CPT has received one thousand one
23 hundred nine (1,109) valid and timely Opt-Out Forms.

24 8. As of the date of this declaration, there are eighteen (18) outstanding
25 disputes with regards to the number of workweeks, employment dates and/or
26 employment state provided on their Claim Form. The eighteen (18) outstanding
27 disputes have been forwarded to Defense Counsel for further review.
28

1 9. As of the date of this declaration, there are three hundred fifteen (315)
2 invalid claims, due to duplicate claim submissions from the same Class Members.

3 10. As of the date of this declaration, there are one hundred nine (119)
4 deficient claims. A deficiency letter has been mailed to these Class Members providing
5 instructions as to how to cure the deficient Claim Form.

6 11. As of the date of this declaration, CPT has received five hundred forty four
7 (544) late forms postmarked between July 3, 2015 and July 29, 2015, of which twenty
8 four (24) are Opt-Out Forms and five hundred twenty (520) are Claim Forms.

9 12. There are one hundred forty nine thousand four hundred eighty seven
10 (149,487) Class Members who were mailed a Notice Packet. As of the date of this
11 declaration, CPT reports a total of thirty one thousand two hundred forty seven
12 (31,247) Class Members submitted valid Claim Forms (at this time including the
13 deficient and late Claim Forms), representing a total response rate of 20.90% of Class
14 Members.

15 13. The thirty one thousand two hundred forty seven (31,247) valid claims
16 represent an estimated claimed amount of \$2,778,260.03, which equates to 37.75% of
17 the Net Settlement Amount. Pursuant to the terms of the Settlement, in the event that
18 the Class Members do not claim a minimum of 65% of Net Settlement Amount, the
19 difference between the claimed amount and the 65% of the Net Settlement Amount
20 will be distributed pro rata to the Class Members who submitted claims.

21 14. CPT will charge \$499,000.00 in costs associated with the administration of
22 the Settlement. This includes all costs incurred to date, as well estimated costs involved
23 in completing the Settlement.

24 I declare under penalty of perjury under the laws of the State of California that
25 the foregoing is true and correct and that this declaration is executed this 30th day of
26 July, 2015 at Irvine, California.

27 
28 **ABEL E. MORALES**